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12 **UNITED STATES BANKRUPTCY COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 **In re:** Case No. 19-30088 (DM)  
16 **PG&E CORPORATION** Chapter 11  
17 **-and-** (Lead Case)  
18 **PACIFIC GAS AND ELECTRIC** (Jointly Administered)  
19 **COMPANY,**  
20 **Debtors**

21  Affects PG&E Corporation  
22  Affects Pacific Gas and Electric Company  
23  Affects both Debtors

24 \*All papers shall be filed in the Lead Case,  
25 No. 19-30088 (DM)

26 **DECLARATION OF MICHAEL A.**  
**KELLY IN SUPPORT OF THE**  
**OPPOSITION OF THE OFFICIAL**  
**COMMITTEE OF TORT CLAIMANTS**  
**TO THE DEBTORS' MOTION**  
**PURSUANT TO 11 U.S.C. §§ 105(a) AND**  
**502(c) FOR THE ESTABLISHMENT OF**  
**WILDFIRE CLAIMS ESTIMATION**  
**PROCEDURES [Dkt. No. 3091]**

27 Date: August 14, 2019  
28 Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

1 I, Michael A. Kelly, declare the following under penalty of perjury pursuant to 28 U.S.C.  
2 section 1746:

3 1. I submit this Amended Declaration in support of the Opposition of the Official  
4 Committee of Tort Claimants to the Debtors' motion to establish wildfire claims estimation  
5 procedures [Dkt. No. 3091]. I have personal knowledge of the facts set forth in this declaration.

6 2. I am a member of the State Bar of California and a partner in the law firm of Walkup,  
7 Melodia, Kelly & Schoenberger.

8 3. After the 2017 North Bay fires occurred, individual victims filed personal injury,  
9 wrongful death, and property damage civil actions for damages suffered in or by reason of the fires  
10 against Pacific Gas & Electric Company ("PG&E") in Sonoma and Napa Counties. The litigation  
11 was eventually coordinated in a Judicial Council Coordination Proceeding entitled California North  
12 Bay Fire Cases, JCCP No. 4955, in the Superior Court of California for the County of San  
13 Francisco.

14 4. The judge assigned to the California North Bay Fire Cases, Judge Curtis Karnow,  
15 entered Case Management Order No.1, dated March 6, 2018, attached hereto as **Exhibit A**, which  
16 appointed me and Frank Pitre as two of the three co-lead counsel in the litigation and an Executive  
17 Committee leadership team of lawyers representing the individual plaintiffs.

18 5. Attached hereto as **Exhibit B** is a true and correct copy of the Superior Court's Case  
19 Management Order No. 2 in the North Bay Fire Cases, JCCP 4955.

20 6. Attached hereto as **Exhibit C** is a true and correct copy of the Superior Court's Case  
21 Management Order No. 3 in the North Bay Fire Cases, JCCP 4955.

22 7. Attached hereto as **Exhibit D** is a true and correct copy of the Superior Court's Case  
23 Management Order No. 4 in the North Bay Fire Cases, JCCP 4955.

24 8. Attached hereto as **Exhibit E** is a true and correct copy of the Superior Court's Case  
25 Management Order No. 5 in the North Bay Fire Cases, JCCP 4955.

26 9. Attached hereto as **Exhibit F** is a true and correct copy of the Superior Court's Case  
27 Management Order No. 6 in the North Bay Fire Cases, JCCP 4955.

1           10. Attached hereto as **Exhibit G** is a true and correct copy of a Camp Fire complaint  
2 in *Williams v. PG&E*, Case No. 18CV03993 (Super. Ct. Cal.).

3           11. Attached hereto as **Exhibit H** is a true and correct copy of a letter, dated August 1,  
4 2019, from Kevin Orsini, counsel to the Debtors.

5           I declare under penalty of perjury that the foregoing is true and correct.  
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7           Executed on August 6, 2019.  
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10             
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